

EXHIBIT B

(CONDITIONALLY FILED REDACTED)

1 LAW OFFICES OF
2 **WALKUP, MELODIA, KELLY & SCHOENBERGER**
3 A PROFESSIONAL CORPORATION

4 650 CALIFORNIA STREET, 26TH FLOOR
5 SAN FRANCISCO, CALIFORNIA 94108-2615
6 T: (415) 981-7210 · F: (415) 391-6965

7 MICHAEL A. KELLY (State Bar #71460)
8 mkelly@walkuplawoffice.com
9 RICHARD H. SCHOENBERGER (State Bar #122190)
10 rschoenberger@walkuplawoffice.com
11 MATTHEW D. DAVIS (State Bar #141986)
12 mdavis@walkuplawoffice.com
13 ASHCON MINOIEFAR (State Bar #347583)
14 aminoiefar@walkuplawoffice.com

15 SHANIN SPECTER (Pennsylvania State Bar No. 40928)
16 (Admitted Pro Hac Vice)

17 shanin.specter@klinespecter.com
18 ALEX VAN DYKE (CA State Bar No. 340379)
19 alex.vandyke@klinespecter.com

20 KLINE & SPECTER, P.C.
21 1525 Locust Street
22 Philadelphia, PA 19102
23 Telephone: (215) 772-1000
24 Facsimile: (215) 772-1359

25 **ATTORNEYS FOR ALL PLAINTIFFS**

26 **UNITED STATES DISTRICT COURT**

27 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

28 JANE ROE, an individual; MARY ROE,
18 an individual; SUSAN ROE, an
19 individual; JOHN ROE, an individual;
20 BARBARA ROE, an individual;
21 PHOENIX HOTEL SF, LLC, a
22 California limited liability company;
23 FUNKY FUN, LLC, a California limited
liability company; and 2930 EL
24 CAMINO, LLC, a California limited
liability company,

25 Plaintiffs,

Case No. 4:24-cv-01562-AMO

26 **DECLARATION OF JOHN ROE (A
27 PSEUDONYM)**

28 **DECLARATION WITH TRUE NAME
OF DECLARANT TO BE FILED
UNDER SEAL**

**DECLARATION WITH TRUE NAME
OF DECLARANT REDACTED TO
BE PUBLICLY FILED**

29 v.
30 CITY AND COUNTY OF SAN
31 FRANCISCO, a California public entity,

32 Defendants.

1 I, [REDACTED], declare as follows:

2 1. I am a resident of the Tenderloin neighborhood in San Francisco and a
3 plaintiff in the above captioned matter. I have personal knowledge of the facts set
4 forth herein. If called as a witness, I could and would competently testify to the
5 matters stated herein.

6 2. I am an immigrant. I was born in South America and have resided in
7 the United States for over 15 years. I am in my late 50s. I am a behavioral health
8 worker. About four years ago my husband and I purchased a home near the corner of
9 Turk and Larkin Street in the Tenderloin District of San Francisco.

10 3. The conditions around my home logically and emotionally affect and
11 drain me. Drug deals happen around my residence at all hours. Dealers dress a
12 specific way and obviously belong to gangs. They are intimidating. I see people on the
13 sidewalk inject drugs. People light fires in front of my home. I hear people in the
14 throes of drug-induced psychotic episodes screaming. The medical examiner's van
15 recently blocked my driveway to pick up the corpse of someone who overdosed. The
16 images below fairly and accurately depict what regular occurs outside of my home:

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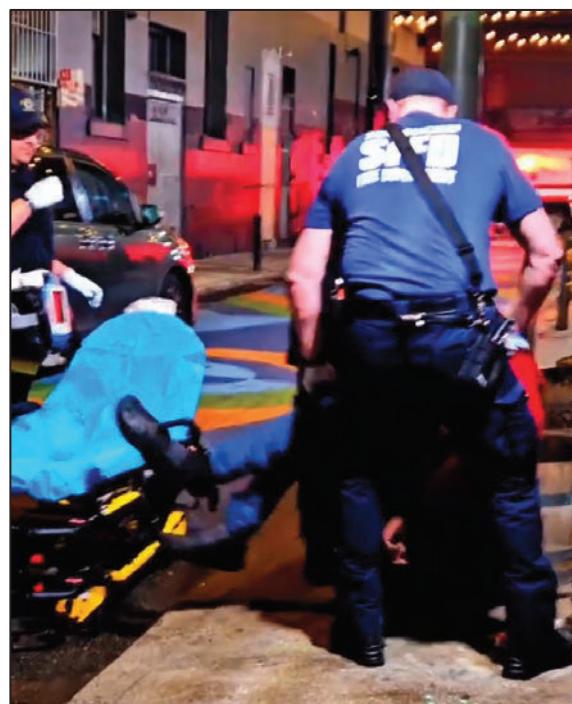
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4. I sometimes hear gunshots. The drug-related violence leaves me fearful and in despair. I see biological hazards and garbage everywhere on the sidewalks and streets. I recently encountered someone defecating in my doorway. When I asked that person to leave, the man threatened me.

1 5. I cannot walk on the sidewalks around my home because drug dealers
2 and addicts gather and block passage. Encampments and stolen goods displayed for
3 sale also make the sidewalks impassable. I must step off the sidewalk and into the
4 street to bypass these dangers and obstacles.

5 6. I regularly report the problems around my home to the City, which
6 rarely responds. Despite the constant open-air crime, I seldom see members of the
7 SFPD on foot patrol in my neighborhood.

8 7. I know that this lawsuit does not seek to recover money damages from
9 the City on my behalf. I am involved in this lawsuit because I think it is critical that
10 the City take immediate steps to address the deplorable conditions around my home
11 and in my neighborhood. I am involved in this lawsuit because I believe it is
12 imperative that the City to make our sidewalks and public spaces clean, safe and
13 accessible. I am also involved in this lawsuit because I believe that the City should
14 treat the Tenderloin like it does most other neighborhoods. I have no problem if my
15 name and other relevant information about me is shared with the City, provided that
16 the City treats it confidential. However, I am concerned that if my name is publicly
17 revealed in court filings, then I would be targeted by drug dealers and other people
18 who engage in criminal activity around my home. I am therefore conflicted about
19 whether I would proceed with this lawsuit if the court ordered that my name be
20 disclosed publicly.

21 I declare under penalty of perjury under the laws of the State of California
22 that the foregoing is true and correct to the best of my knowledge.

23 Executed on this 21st day of March, 2024, at San Francisco, California.

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